

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et al.*, individually and
on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Judge: Hon. Yvonne Gonzalez Rogers

[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to File Under Seal Portions of Plaintiffs' Opposition to Google's Motion for Summary Judgment (Dkt. 924) ("Motion"). Having considered the Motion, supporting declarations, and other papers on file, and compelling reasons having been found, the Court **ORDERS** as follows:

Document or Portion of Document Sought to be Sealed	Evidence Offered in Support of Sealing	Ruling
Plaintiffs' Opposition to Google's Motion for Summary Judgment (Dkt. 924-3) Pages 2:6, 9:1, 9:20, 9:25-27, 18:2, 18:20	Margolies Declaration ¶¶ 4-5	
Plaintiffs' Responsive Separate Statement Regarding Material Facts (Dkt. 924-4) Pages 8:26, 9:15, 10:14, 11:17, 15:16, 18:9, 21:4, 22:15, 23:14, 25:4, 29:9, 32:18	Margolies Declaration ¶¶ 4-5	
Exhibit 8 to Mao Declaration - 6/7/22 Rebuttal to Zervas and Supplemental Report of Jonathan Hochman Pages 8-18, 20-23, 26, 28, 30-31, 33, 35-37, 40, 42-44, 48-50, 66-67. 69, 71-74 Appendix A (Elec) - Seal Entirely Appendix B (Elec) - Seal Entirely Appendix C (Elec) - Seal Entirely Appendix D (Elec) - Seal Entirely Appendix E (Elec) - Seal Entirely Appendix F (Elec) - Seal Entirely Appendix G (Elec) - Seal Entirely Appendix H (Elec) - Seal Entirely Appendix I (Elec) - includes mp4 and .saz files - AEO by Plaintiffs Appendix J - Seal Entirely Appendix K (Elec) - Seal Entirely Exhibit A (Elec) - Seal Entirely by Plaintiffs	Margolies Declaration ¶¶ 4-5	

1	Exhibit B (Elec) - Sealed Entirely by Plaintiffs		
2	Exhibit 9 to Mao Declaration - GOOG-CABR-00501220	Margolies Declaration ¶¶ 4-5	
3	Pages -1221, -1222, -1224, -1225		
4	Exhibit 10 to Mao Declaration - GOOG-BRWN-00613409	Margolies Declaration ¶¶ 4-5	
5	Page -409		
6	Exhibit 11 to Mao Declaration - GOOG-BRWN-00613409	Margolies Declaration ¶¶ 4-5	
7	Pages -484, -487		
8	Exhibit 13 to Mao Declaration - GOOG-BRWN-00032906	Margolies Declaration ¶¶ 4-5	
9	Seal Entirely		
10	Exhibit 17 to Mao Declaration - 6/7/22 Expert Rebuttal Report of Bruce Schneier; Rebuttal of Expert Georgios Zervas	Margolies Declaration ¶¶ 4-5	
11	Pages 11-14, 21, 23-25		
12	Exhibit 18 to Mao Declaration - 2/14/23 Glenn Berntson Depo. Trans. Excerpts	Margolies Declaration ¶¶ 4-5	
13	Page 38:9		
14	Exhibit 20 to Mao Declaration - 2/18/22 Rory McClelland Depo. Trans. Excerpts	Margolies Declaration ¶¶ 4-5	
15	Pages 124:5, 132:15, 133:17, 133:20-134:4, 134:15		
16	Exhibit 22 to Mao Declaration - GOOG-BRWN-00490767	Margolies Declaration ¶¶ 4-5	
17	Seal Entirely		
18	Exhibit 25 to Mao Declaration - 4/22/22 Expert Report of Michael Lasinski	Margolies Declaration ¶¶ 4-5	
19	Pages: TOC, 1-2, 7, 9-16, 18-59, 65-67, 73-78, 80-82		
20	Lasinski Schedules: PDF Pages 107-178, 180-184, 186-188, 190, 192, 196,		

1	199-203, 205-214, 216-230, 232, 235-239, 241-297		
2	Exhibit 26 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	
3	12/20/22 QE Letter to BSF		
4	Pages 1-2		
5	Exhibit 32 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	
6	GOOG-BRWN-0042388		
7	Pages -404, -408, -410		
8	Exhibit 37 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	
9	GOOG-BRWN-00047341		
10	Page -344		
11	Exhibit 38 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	
12	GOOG-CABR-04431207		
13	Seal Entirely		
14	Exhibit 41 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	
15	GOOG-BRWN-00477510		
16	Seal Entirely		
17	Exhibit 42 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	
18	GOOG-CABR-00084985		
19	Page -5043		
20	Exhibit 44 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	
21	GOOG-CABR-04261880		
22	Page -1880		
23	Exhibit 45 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	
24	GOOG-BRWN-00410884		
25	Pages -0884, -0885, -0886, PDF pages 4-5		
26	Exhibit 46 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	
27	GOOG-CABR-05145513		
28	Seal Entirely		
	Exhibit 47 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	
	GOOG-CABR-03923580		
	Pages -3580-584, PDF page 6		
	Exhibit 48 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	
	GOOG-BRWN-00410884		
	Pages -0884, -0885, -0886, PDF pages 4-5		

1	Exhibit 49 to Mao Declaration - GOOG-BRWN-00475063	Margolies Declaration ¶¶ 4-5	
2			
3	Pages -5063-5064, -5066		
4	Exhibit 51 to Mao Declaration - GOOG-BRWN-00686207	Margolies Declaration ¶¶ 4-5	
5	Seal Entirely		
6	Exhibit 52 to Mao Declaration - GOOG-BRWN-00164056	Margolies Declaration ¶¶ 4-5	
7	Seal Entirely		
8	Exhibit 53 to Mao Declaration - GOOG-BRWN-00047341	Margolies Declaration ¶¶ 4-5	
9	Page -344		
10	Exhibit 54 to Mao Declaration - GOOG-BRWN-00047341	Margolies Declaration ¶¶ 4-5	
11	Page -344		
12	Exhibit 55 to Mao Declaration - GOOG-BRWN-00056809	Margolies Declaration ¶¶ 4-5	
13	Seal Entirely		
14	Exhibit 56 to Mao Declaration - 10/11/22 Trans. of Proceedings Excerpts	Margolies Declaration ¶¶ 4-5	
15	Page 14:18-19		
16	Exhibit 60 to Mao Declaration - GOOG-CABR-03827263	Margolies Declaration ¶¶ 4-5	
17	Page -7263		
18	Exhibit 63 to Mao Declaration - GOOG-BRWN-00465037	Margolies Declaration ¶¶ 4-5	
19	Seal Entirely		
20	Exhibit 66 to Mao Declaration - GOOG-CABR-04746153	Margolies Declaration ¶¶ 4-5	
21	Seal Entirely		
22	Exhibit 69 to Mao Declaration - GOOG-CABR-05836882	Margolies Declaration ¶¶ 4-5	
23	Seal Entirely		
24	Exhibit 70 to Mao Declaration - GOOG-CABR-05150754	Margolies Declaration ¶¶ 4-5	
25			
26			
27			
28			

1	Seal Entirely		
2	Exhibit 71 to Mao Declaration - GOOG-BRWN-00166653	Margolies Declaration ¶¶ 4-5	
3	Seal Entirely		
4	Exhibit 72 to Mao Declaration - GOOG-BRWN-00164056	Margolies Declaration ¶¶ 4-5	
5	Seal Entirely		
6	Exhibit 73 to Mao Declaration - GOOG-BRWN-00406065	Margolies Declaration ¶¶ 4-5	
7			
8	Pages -6065-6069		
9	Exhibit 77 to Mao Declaration - GOOG-BRWN-00147864	Margolies Declaration ¶¶ 4-5	
10	PDF Page 2		
11	Exhibit 79 to Mao Declaration - GOOG-BRWN-00047399	Margolies Declaration ¶¶ 4-5	
12	Seal Entirely		
13	Exhibit 80 to Mao Declaration - GOOG-BRWN-00140297	Margolies Declaration ¶¶ 4-5	
14			
15	Pages -0311-313, -0315-319, -0323, - 0325, -0327-329		
16	Exhibit 81 to Mao Declaration - GOOG-CABR-00501220	Margolies Declaration ¶¶ 4-5	
17			
18	Pages -1221, -1222, -1224, -1225		
19	Exhibit 82 to Mao Declaration - GOOG-BRWN-00176477	Margolies Declaration ¶¶ 4-5	
20	Pages -6478, -6479, -6480		
21	Exhibit 84 to Mao Declaration - GOOG-BRWN-00067645	Margolies Declaration ¶¶ 4-5	
22	Seal Entirely		
23	Exhibit 85 to Mao Declaration - GOOG-BRWN-00182492	Margolies Declaration ¶¶ 4-5	
24			
25	Page -2492		
26	Exhibit 86 to Mao Declaration - GOOG-BRWN-00182492	Margolies Declaration ¶¶ 4-5	
27	Pages -7391, -7395, -7396, -7397, - 7398		
28	Exhibit 88 to Mao Declaration -	Margolies Declaration ¶¶ 4-5	

1	GOOG-CABR-04739841		
2	Seal Entirely		
3	Exhibit 92 to Mao Declaration - GOOG-BRWN-00047390	Margolies Declaration ¶¶ 4-5	
4	Pages -7391, -7395, -7396, -7397, -		
5	7398		
6	Exhibit 93 to Mao Declaration - GOOG-BRWN-00388293	Margolies Declaration ¶¶ 4-5	
7	Page -8295		
8	Exhibit 94 to Mao Declaration - GOOG-BRWN-00176477	Margolies Declaration ¶¶ 4-5	
9	Pages -6478, -6479, -6480		
10	Exhibit 95 to Mao Declaration - GOOG-BRWN-00202175	Margolies Declaration ¶¶ 4-5	
11	Seal Entirely		
12	Exhibit 96 to Mao Declaration - GOOG-BRWN-00433503	Margolies Declaration ¶¶ 4-5	
13	Seal Entirely		
14	Exhibit 97 to Mao Declaration - GOOG-BRWN-00391231	Margolies Declaration ¶¶ 4-5	
15	Pages -231, -232		
16	Exhibit 105 to Mao Declaration - Hochman Opening Report Exhibit B (submitted by Hard Drive)	Margolies Declaration ¶¶ 4-5	
17	Seal Entirely		

23 **SO ORDERED.**

24
25 DATED: _____

HON. YVONNE GONZALEZ ROGERS
United States District Judge